

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

PATRICE CHAMBERS, on behalf of
herself and all others similarly situated,

Plaintiff,

vs.

HSBC BANK USA, N.A.

Defendant.

Civil Action No. 19-cv-10436

Hon. Edgardo Ramos

**NOTICE OF MOTION AND PLAINTIFF'S MOTION FOR APPROVAL OF
ATTORNEYS' FEES, EXPENSES, AND SERVICE AWARD**

PLEASE TAKE NOTICE that on October 20, 2022, at 11:00 a.m., a hearing will be held before the Honorable Edgardo Ramos, United States District Judge for the Southern District of New York, in Courtroom 619, 40 Foley Square, New York, NY 10007, or, subject to further order of the Court, by telephone or videoconference, at which Plaintiff Class Representatives Patrice Chambers will, and hereby does, move the Court, under Federal Rules of Civil Procedure 23(h) and 54(d)(2), for entry of an order approving the following payments from the Settlement Fund created by the Settlement Agreement and Release, ECF No. 62-1:

(1) \$658,333.33 (one-third (1/3) of the Settlement Amount) as attorneys' fees to Class Counsel;

(2) \$31,050.82 in reimbursement of litigation expenses that were advanced by Class Counsel; and

(3) \$5,000 to the Class Representative as a service award.

This Motion is based on this Notice of Motion and Motion, Plaintiffs' Memorandum in Support of this Motion and all its exhibits, the Settlement Agreement and Releases and all its exhibits, the argument of counsel, all papers and records on file in this matter, and such other matters as the Court may consider. This Notice of Motion and Motion, along with the accompanying papers, will be posted to the settlement website for review by any Class Member free of charge.

Date: August 24, 2022

Respectfully submitted,

/s/ David M. Berger

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*Counsel for Plaintiff and the
Settlement Class*

CERTIFICATE OF SERVICE

I certify that on August 24, 2022, a true and accurate copy of the foregoing notice was filed electronically with the Clerk of Court using the CM/ECF system, which will send notification of such filing to all counsel of record.

/s/ David M. Berger

David M. Berger